

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
AGRICULTURE, *et al.*,

Defendants.

Case No. 1:25-cv-00748-JKB

RESTRAINED DEFENDANTS' COMPLIANCE STATUS REPORT

Defendants, through undersigned counsel, hereby file a Status Report documenting the actions they have taken to comply with the Court's Temporary Restraining Order ("TRO") of March 13, 2025 (ECF No. 43). The Court's order applies to 21 federal agencies (ECF 44 at 2-3) (hereinafter "Restrained Defendants").¹ Plaintiffs filed a motion for a temporary restraining order on March 9, 2025; Defendants filed an opposition on March 10, 2025; and the Court heard argument on March 12, 2025. On March 13, 2025, at approximately 8:30 PM, the Court issued the TRO, which stayed the "purported terminations" of "Affected Probationary Employees" and ordered the reinstatement of those same employees, in addition to an order directing Restrained Defendants to conduct any future Reductions in Force ("RIFs") consistent with statutory and

¹ The Restrained Defendants include United States Department of Agriculture; United States Department of Commerce; United States Department of Education; United States Department of Energy; United States Department of Health and Human Services; United States Department of Homeland Security; United States Department of Housing and Urban Development; United States Department of Interior; United States Department of Labor; United States Department of Transportation; United States Department of Treasury; United States Department of Veterans Affairs; Consumer Financial Protection Bureau; Environmental Protection Agency; Federal Deposit Insurance Corporation; General Services Administration; Small Business Administration; and the U.S. Agency for International Development, along with their corresponding agency personnel.

regulatory requirements. The Court's Order also required the filing of a Compliance Report, as per this term:

On or before Monday, March 17, 2025, at 1:00 p.m. EDT, the Restrained Defendants SHALL FILE on the Court's electronic docket a Status Report documenting the actions that they have taken to comply with this Order. Such Status Report shall set forth the number of Affected Probationary Employees reinstated at each Defendant agency, broken down by subagency, department, and/or other subdivision, to the greatest degree of granularity practicable.

ECF 44 at 3. Consistent with the Court's order, Restrained Defendants submit this compliance status report. In support of this Compliance Report, Restrained Defendants submit the attached Declarations, *see* Exhibit 1, which demonstrate their compliance with the TRO. Defendants will continue all reasonable efforts to summarize the progress of all remaining Restrained Defendants and submit any further reports as needed.

Respectfully submitted,

YAAKOV ROTH
Acting Assistant Attorney General
Civil Division

ERIC J. HAMILTON
Deputy Assistant Attorney General

DIANE KELLEHER
Branch Director

/s/ Christopher R. Hall
Christopher R. Hall
Assistant Director, U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, D.C. 20005
Tel.: (202) 305-4778
Email: Christopher.hall@usdoj.gov

KELLY O. HAYES
United States Attorney

/s/ Beatrice C. Thomas

Beatrice C. Thomas
Assistant United States Attorney
United States Attorney's Office
36 S. Charles Street, 4th Floor
Baltimore, MD 21202
Email: beatrice.thomas@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on this 17th day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notice of such filing to all counsel.

/s/ Beatrice C. Thomas

Beatrice C. Thomas

Assistant United States Attorney